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8 UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 In re:

11 NORTHWEST TERRITORIAL MINT, LLC,
12 Debtor.

Case No. 16-11767-CMA

DECLARATION OF SUSAN SKAGGS
IN SUPPORT OF MOTION FOR
ORDER APPROVING THE SALE OF
CERTAIN OF THE DEBTOR'S
ASSETS TO MEDALCRAFT MINT,
INC.

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15 I, Susan Skaggs, hereby declare:

16 1. I am the former director of sales for Northwest Territorial Mint, LLC dba Medallic
17 Art Company ("Medallic"). Unless otherwise stated, I make the following statements based on my
18 personal knowledge. I submit this Declaration in support of the Motion for Order Approving the Sale
19 of Certain of the Debtor's Assets to Medalcraft Mint, Inc. (the "Motion"). I was employed by the
20 Debtor for approximately nine years, beginning in 2009. I am over the age of eighteen and I am
21 competent in all ways to testify.

22
23 2. Throughout my tenure at Medallic, it was always Medallic's policy that Medallic
24 owned the dies it created to fulfill customer orders. The price charged to the customer for the
25 creation of a die was not for the sale of the die, but for the labor to produce the die, storage, and
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DECLARATION OF SUSAN SKAGGS - 1

501036674 v1

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1 replacement if there was a problem during the manufacturing process.

2 3. Although Medallic owned the dies it created, each die was held for the exclusive
3 purpose of creating product for the benefit of the customer who commissioned the die.

4 I declare under penalty of perjury that the foregoing is true and correct to the best of my
5 knowledge and belief.

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7 EXECUTED this 16TH day of February, at Dayton, Nevada

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9 By: 
10 Susan Skaggs

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DECLARATION OF SUSAN SKAGGS - 2

501036674 v1

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1 **CERTIFICATE OF SERVICE**

2 The undersigned declares as follows:

3 That she is a Paralegal in the law firm of K&L Gates LLP, and on February 16, 2018, she
4 caused the foregoing document to be filed electronically through the CM/ECF system which caused
5 Registered Participants to be served by electronic means, as fully reflected on the Notice of
6 Electronic Filing.

7 Also on February 16, 2018, she caused the foregoing document to be placed in the mail to the
8 Parties at the addresses listed below:

9 Northwest Territorial Mint LLC
10 c/o Ross Hansen, Member
11 P.O. Box 2148
12 Auburn, WA 98071-2148

13 I declare under penalty of perjury under the laws of the State of Washington and the United
14 States that the foregoing is true and correct.

15 Executed on the 16th day of February, 2018 at Seattle, Washington.

16 /s/ Denise A. Lentz
17 Denise A. Lentz
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DECLARATION OF SUSAN SKAGGS - 3

501036674 v1

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